

Exhibit K

In Re:

Digitek

Paul Galea

December 9, 2009

Confidential – Subject to Further Confidentiality Review

GOLKOW TECHNOLOGIES, INC.

Excellence In Court Reporting For Over 20 Years

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Min-C-Scripte with Word Index

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1 Q. Okay. So in -- well, then I'll
2 represent to you this letter came out
3 February 1st of 2007.
4 When you had your discussions
5 regarding this revised warning letter, did you
6 understand it to be a warning letter regarding
7 issues with the GMP of Actavis Totowa?
8 MR. ANDERTON: Objection.
9 You may answer.
10 THE WITNESS: Yes.
11 BY MR. MILLER:
12 Q. When you did learn of this
13 letter, did you request a copy of it?
14 A. No. I did not request a copy
15 of it.
16 Q. Once you -- did you ever learn
17 of the contents of the letter?
18 Although you haven't held it and
19 read it, when you had conversations about it,
20 were you informed or discussed the actual
21 contents of it?
22 MR. ANDERTON: Objection.
23 You may answer.
24 THE WITNESS: Yes.

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1 BY MR. MILLER:
2 Q. And you believe that to have
3 been sometime in 2007?
4 A. Yes.
5 Q. And when you learned of the
6 contents of the revised warning letter in
7 2007 and you were making multiple visits
8 for assessment and harmonization of the
9 GMP of Actavis Totowa, you didn't feel it
10 would be important for you to have a copy
11 of it?
12 MR. ANDERTON: Objection.
13 You may answer.
14 THE WITNESS: Not really, because
15 once we had discussed the content, the actual
16 physical document doesn't really matter to me.
17 BY MR. MILLER:
18 Q. Doesn't matter to you because
19 you felt you gained enough from the
20 conversation, that the contents of the
21 document aren't required.
22 MR. ANDERTON: Objection.
23 You may answer.
24 THE WITNESS: I would say yes,

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1 because if I was discussing this particular
2 letter with the site head of quality, who I do
3 not believe had any reason to -- to lie to me on
4 this letter.
5 BY MR. MILLER:
6 Q. Oh, I'm not suggesting anyone
7 would have lied to you about the letter.
8 I'm just -- if you'd take a look at
9 the letter, there's quite a bit of information,
10 and I want to break it down here in a minute,
11 but just seems -- well, never mind. Strike
12 that.
13 You understand that this case is
14 about Digoxin?
15 A. Yes.
16 Q. And Digoxin, you understand, is
17 an active ingredient in Digitek?
18 A. Yes.
19 Q. And Digitek was manufactured by
20 Actavis Totowa?
21 A. Yes.
22 Q. And Digitek was recalled from
23 the market in the United States.
24 A. Yes.

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1 Q. And it was a Class I recall?
2 A. Yes.
3 Q. Do you know what a Class I
4 recall is?
5 A. Yes.
6 Q. In your words, what's a Class I
7 recall?
8 A. Basically, when you're taking
9 everything off the market because there is
10 a potential serious issue with the
11 medication.
12 Q. And do you know when Digitek
13 was taken off the market?
14 A. I believe Digitek was taken off
15 the market around about March, April of
16 2008.
17 Q. Right.
18 And, subsequently, were all
19 products removed from the market at Actavis
20 Totowa that same year?
21 A. I believe so, yes.
22 Q. And do you have an
23 understanding of when that took place?
24 A. I believe it was subsequent to